

re: RM-10313

In response to the proposal for Auxiliary operation change to 2m, I find several points in the proposal that are of interest (paraphrased):

- 1) That Amateur Radio Operators want to use Auxiliary operation-
- 2) The current rules prohibiting Auxiliary operation below the 1.25 cm band should be changed.
- 3) Equipment exists in the petitioners inventory that can be used for the proposed objective.
- 4) Uses for the Auxiliary operation as stated are new and Amateurs are ready for it.

1) It may be true that Amateur Radio Operators would want to use Auxiliary operation during emergencies or disasters, or even for their casual everyday use. But, I have not seen any Emergency agencies calling for the need of HF radios linked through VHF control. If the need for this type of operation was in demand, I would see interest in it in letters and editorials. I have not seen it.

For the casual user, either with a temporary need or permanent need, what advantage would auxiliary operation on 2m/70cm afford this type of user? I would not want to see the user in a mobile situation trying to key in command information while driving. This would be more dangerous than dialing a cell phone. A casual user would need to be stationary while away from the HF radio. What situation would this be? Could be a demonstration or some other temporary use. The antennas required for this type of operation could be used on the 1.25 cm band and above. the petitioner did not list any use that would make the change to 2m worthwhile. I don't believe the rules should change for this reason.

2) The petitioner believes that the 2m/70 cm bands should be used. The petitioner states that the frequencies between 145.8 to 146.0 will be excluded from Auxiliary operation. I don't believe that the higher frequencies in the 2m band would be useful for Auxiliary use due to high useage in many parts of the country. Band useage above 1.25 cm is used less than 2m and 70 cm. And using the logic stated in the above paragrpahs, a stationary, remote, and temporary use seems more likely. This would make it more likely that a suitable antenna and equipment for 1.25 cm and above could be used.

3) The petitioner states that equipment exists that could be used to provide the Auxiliary operation on 2m/70 cm. I don't believe that this should be an argument to change a rule. The proposal does not address, nor is there an advantage, technically, to use the 2m/70 cm bands. Equipment also exists for use above 1.25 cm.

4) The petitioner states (paraphrased) that the Amateur Radio community is ready and able to take on the technological advantage of the remote control of HF equipment. I refer again to the first paragraphs of this comment, and disagree with the petitioners statement that there is an abundance of willing participants that would use the equipment, (unless it is a temporary use for emergencies), and that being the case, the current FCC regulation does not need to be changed.

I do not agree with the petitioners proposal.

Respectfully submitted-  
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